

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Ray C. Schrock, P.C.  
Jacqueline Marcus  
Garrett A. Fail  
Sunny Singh

*Attorneys for Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
<b>In re</b>	: <b>Chapter 11</b>
	:
<b>SEARS HOLDINGS CORPORATION, et al.,</b>	: <b>Case No. 18-23538 (RDD)</b>
	:
<b>Debtors.<sup>1</sup></b>	: <b>(Jointly Administered)</b>
-----X	

**CERTIFICATE OF NO OBJECTION PURSUANT TO  
28 U.S.C. § 1746 REGARDING DEBTORS' THIRTY-SIXTH OMNIBUS  
OBJECTION TO PROOFS OF CLAIMS (RECLASSIFYING CLAIMS)**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 1700 Broadway, 19<sup>th</sup> Floor, New York, New York 10019.

TO THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the *Amended Order Implementing Certain Notice and Case Management Procedures*, entered on November 1, 2018 (ECF No. 405) (the "**Amended Case Management Order**"), the undersigned hereby certifies as follows:

1. On October 19, 2021, Sears Holdings Corporation and certain of its affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "**Debtors**"), filed the *Debtors' Thirty-Sixth Omnibus Objection to Proofs of Claim (Reclassifying Claims)* (ECF No. 9975) (the "**Omnibus Objection**").

2. In accordance with the Amended Case Management Order, the Debtors established a deadline for parties to file responses to the Omnibus Objection (the "**Response Deadline**"). The Response Deadline was set for November 2, 2021, at 4:00 p.m. (prevailing Eastern Time). The Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on, or prior to, the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadline has now passed and, to the best of my knowledge, with respect to the claims identified on **Exhibit 1** to the proposed order granting the relief requested in the Omnibus Objection (the "**Proposed Order**"), a copy of which is annexed hereto as **Exhibit A**, no responsive pleadings have been filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Amended Case Management Order or served on counsel to the Debtors.

4. A redline of the Proposed Order marked against the version attached to the Omnibus Objection is attached hereto as **Exhibit B**.

5. Accordingly, the Debtors respectfully request that the Proposed Order be entered in accordance with the procedures described in the Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: November 5, 2021  
New York, New York

/s/ Garrett A. Fail

Ray C. Schrock, P.C.

Jacqueline Marcus

Garrett A. Fail

Sunny Singh

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

*Attorneys for Debtors*

*and Debtors in Possession*

**Exhibit A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
<b>In re</b>	<b>: Chapter 11</b>
	<b>: </b>
<b>SEARS HOLDINGS CORPORATION, et al.,</b>	<b>: Case No. 18-23538 (RDD)</b>
	<b>: </b>
<b>Debtors.<sup>2</sup></b>	<b>: (Jointly Administered)</b>
-----X	

**ORDER GRANTING DEBTORS' THIRTY-SIXTH  
OMNIBUS OBJECTION TO PROOFS OF CLAIM  
(RECLASSIFYING CLAIMS)**

Upon the *Debtors' Thirty-Sixth Omnibus Objection to Proofs of Claim (Reclassifying Claims)*, filed on October 19, 2021 (the "**Objection**"),<sup>3</sup> of Sears Holdings Corporation and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "**Debtors**"), pursuant to section 502 under title 11 of the United States Code (the "**Bankruptcy Code**"), and Rule 3007 of the Federal Rules of Bankruptcy Procedures (the "**Bankruptcy Rules**"), all as more fully set forth in the Objection; and the

<sup>2</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brands Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is c/o M-III Partners, LP, 1700 Broadway, 19th Floor, New York, NY 10019.

<sup>3</sup> Capitalized terms not otherwise herein defined shall have the meanings ascribed to such terms in the Objection.

Bankruptcy Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. §§ 157(a)-(b) and 1334 and the *Amended Standing Order of Reference M-431*, dated January 31, 2012 (Preska, C.J.); and consideration of the Objection and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Bankruptcy Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the relief requested in the Objection having been provided, and it appearing that no other or further notice need be provided in accordance with the Amended Case Management Order; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and the Bankruptcy Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and that the relief sought in the Objection is in the best interests of the Debtors, their estates, their creditors, and all parties in interest; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT**

1. The Objection is granted.
2. Pursuant to section 502 of the Bankruptcy Code and Bankruptcy Rule 3007, each Proof of Claim listed on **Exhibit 1** annexed hereto and each asserted claim associated therewith (collectively, the “**Disputed Claims**”) is reclassified in its entirety to a general unsecured claim.
3. This Order shall not be deemed to waive, impair, release, or effect on any claims, causes of action the Debtors may hold against the Claimants, including but not limited to, claims under chapter 5 of the Bankruptcy Code, and all claims and causes of action against such Claimants shall be expressly preserved.

4. The rights of the Debtors to assert further objections to the Disputed Claims, in whole or in part, and on any basis, are fully preserved.

5. The Debtors, the Debtors' claims and noticing agent, Prime Clerk, and the Clerk of this Bankruptcy Court are authorized to take all actions necessary or appropriate to give effect to this Order.

6. The terms and conditions of this Order are effective immediately upon entry.

Dated: \_\_\_\_\_, 2021  
White Plains, New York

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HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**

**Disputed Claims**



**Debtors' Thirty-Sixth Omnibus Objection to Claims**  
**Exhibit 1 - Disputed Claims**

Schedule of Disputed Claims to be Reclassified		
Ref #	Disputed Claims	Affected Proof of Claim No.
1.	10 MANAGEMENT INCORPORATED, INC	4521
2.	A-1 MULTI SERVICE LLC	2329
3.	AHMED, IKHLAS	18781
4.	AHS STAFFING, LLC (FORMERLY PHARMSTAT, LLC)	1227
5.	ALBRIGHT, TARA	9890
6.	ALDRIDGE, MATT	2630
7.	ALL AMERICAN DOOR	15188
8.	ALLEN, BARBARA	14188
9.	ALLIANCE WORKFORCE SOLUTIONS, LLC	5520
10.	ALLIANCE WORKFORCE SOLUTIONS, LLC	15385
11.	ALLIED UNIVERSAL SECURITY SERVICES	2967
12.	ALVAREZ, VIVIAN	10888
13.	AMAZING WL LTD COMPANY	8637
14.	AMMONS, STERLING	13897
15.	AMY MORTON DBA MID STATES PARKING LOT	5542
16.	ANTHONY BROWN LLC	4509
17.	APPLIED STAFFING SOLUTIONS LLC	14858
18.	ARCE, LAUREN	1789
19.	ARENAS, ESTHER AMANDA	8208
20.	ARENAS, ESTHER AMANDA	8327
21.	ARTHUR WOLFORD LLC	10658
22.	ASCHOFF, MICHAEL P	12003
23.	AUSTIN, CATHERINE	16313
24.	AXIOM STAFFING GROUP INC	7056
25.	BAKER, ROBERTA JOAN	4464
26.	BANKS, MARGARET	12990
27.	BARKER III, CHARLES	18975
28.	BARKER III, CHARLES	6403
29.	BARKER, DARLA	17031
30.	BARNES, ANNIE	16839
31.	BAZAN, FRANCES	5020
32.	BENISON, SHONTAE	19448
33.	BENS, TAWANA	12572
34.	BENTON, NITA	17506
35.	BERRY, BOBBY	11062
36.	BLANEY, MARIA	9799
37.	BONNER-SMITH, DENISE	10199
38.	BOUTROS, PIERRE	8979
39.	BOYD, JAMES	10550
40.	BRAUN, LAURENCE	13227
41.	BROWN, ARDREE D.	17029
42.	BROWN, ROBERT	11397
43.	BUCKLEY, SHIRLEY	9691
44.	BULLOCK, STEVE D	16633
45.	BURGER, SANDRA GOFF	1880
46.	BUTLER, ALFREDIA	13219
47.	BUYZE, ADRIAN C.	6026
48.	BYERLEY, DAVID	11160
49.	BYRD, DONNIE L	18916
50.	CALHOUN, ANGIE	11536
51.	CALLISONRTKL	7619
52.	CALLISONRTKL	7965
53.	CAMPBELL, BENJAMIN T.	7115
54.	CANADY, JEROME	9631
55.	CAPITAL BUILDING SERVICES GROUP, INC	17288
56.	CAPITAL BUILDING SERVICES GROUP, INC	17443
57.	CARRAWAY, PEDRO	9022
58.	CARRIBEAN LOTTERY SERVICES	12779
59.	CARROLL, JUANITA	11118
60.	CARTER, BRIANA	5901
61.	CASILLAS, LUIS	17764
62.	CHAMPION, JANICE	12993

**Debtors' Thirty-Sixth Omnibus Objection to Claims**  
**Exhibit 1 - Disputed Claims**

Schedule of Disputed Claims to be Reclassified		
Ref #	Disputed Claims	Affected Proof of Claim No.
63.	CHAN, NGO	13233
64.	CHILDREN'S ISLAND CORPORATION	2479
65.	CHRISTOPHER BURT OD PC	6661
66.	CHRONOSTORE	1617
67.	CHRONOSTORE	8291
68.	CINTRON, CAROL	16193
70.	CLAYTON, DEBRA	16537
71.	COLLINS, YVONNE	14999
72.	COMFY CONSTRUCTION LLC	1040
73.	CONNIE E. CARRASCO - DD LANDSCAPE AND LAWN SERVICE	8043
74.	CONNORS, FONG AND MANCUSO, INC	8700
75.	CONNORS, FONG AND MANCUSO, INC.	8241
76.	CONNORS, FONG AND MANCUSO, INC.	8244
77.	CONTI, BIAGIO	19184
78.	CONWAY, PEGGY	19971
79.	COOK, STEVEN	12907
80.	COOL BREEZE HVAC INC	4474
81.	COOL BREEZE HVAC INC	4554
82.	COTTLE, SHIRLEY	17923
83.	CRAIG, ATHENA	14292
84.	CRAWFORD, CYNTHIA	19329
85.	CREATIVE CIRCLE, LLC	6792
86.	CRESCENT ACE HARDWARE	8530
87.	CRONAN, DAN M	4575
88.	CROOK, JEFFREY W.	16386
89.	CROSLAND, CINDY D	3030
90.	CROSS, RICHARD	2064
91.	CUBY, VIRGINIA	10904
92.	CURRY, JADA M	10475
93.	D & M STRIPING	10293
94.	D&C MEDIA LLC	2057
95.	DACRUZ, ROBERT	12873
96.	DAVE MANCIA, DUNS # 1000338016	755
97.	DAVID KAIRYS OD	5495
98.	DAVIS, BRENDA	19312
99.	DAVIS, JOSEPH T	6690
100.	DAVY, MARIO	8542
101.	DE BILLAS LUX	3651
102.	DEAN, JOHN	11947
103.	DEE HEFFERNAN, INC.	618
104.	DEJOIE, KENNETH	7159
106.	DEWITT & FLO HOLLINGSWORTH	16246
107.	DIFOGGIO PLUMBING PARTNERS, INC	4992
108.	DIMARTINO, MICHELINA	5288
109.	DIPAULO, VALENCIA TOOPS	19511
110.	DONAHUE, JOSEPH	18966
111.	DONE RIGHT INSTALLATIONS	7022
112.	DR. HOLLY LEWTON PC	16800
113.	DR. NICHOLAS KREVATAS PA	4886
114.	DRIVERS PLUMBING & MECHANICAL INC	17133
115.	DUMA, ROGEL	2795
116.	DUNBAR, SELEYOUN	8416
117.	DUNLAP, KEVIN	9478
118.	DUNLAP, KEVIN L.	9579
119.	DUNN, CAROL A	2650
120.	DURFEY, JAMES R.	8091
121.	EADDY, LORRAINE BOONE	14119
122.	EAGLE NURSERIES INC.	3788
123.	EL DORADO LOCATORS	1226
124.	EL-HABRE, SUZANNE	5063
125.	EL-HABRE, SUZANNE	12213
126.	EMARKTPLACE SOLUTIONS LLC	4643

**Debtors' Thirty-Sixth Omnibus Objection to Claims**  
**Exhibit 1 - Disputed Claims**

Schedule of Disputed Claims to be Reclassified		
Ref #	Disputed Claims	Affected Proof of Claim No.
127.	EMPLOYMENT SOLUTIONS	119
128.	ESPOSITO, ROBERT	13792
129.	ESQUIVEL, ERIKA	1702
130.	ESQUIVEL, ERIKA J	1987
131.	ESTEP, TERRI L.	26436
132.	ESTEP, TERRI L	26435
133.	EVANS, DEBORAH L	6500
134.	EVELAND, ROBERT	18332
135.	EXCEL BUILDING SERVICES LLC	14835
136.	EXCEL BUILDING SERVICES, LLC	5500
137.	EXPRESS EMPLOYMENT PROFESSIONALS	7892
138.	EXPRESS SERVICES INC.	8145
139.	FACT AUTOMATED ENTRANCES, INC	7966
140.	FAISON, SHIRLEY	10050
141.	FANELLI, HELEN	18578
142.	FERGUSON, MARY L.	19677
143.	FERNANDEZ, ELYSE	4773
144.	FIRE & ICE HEATING AND COOLING	1008
145.	FITZGERALD, SHAWN	1564
146.	FORCE, EMILY	5805
147.	FOREST FAMILY EYE CARE CLINIC	18378
148.	FORRESTER, BRIAN	9314
149.	FOUR SEASONS SIDING, INC.	677
150.	FRANCIS, ELAINE	18651
151.	FRAZIER, RUBY	15487
152.	FRUGE, JULIE M	4398
153.	GALLAGHER, ALANE	7970
154.	GARCIA FAMILY ENTERPRISES LLC	19540
155.	GARRETT, LINDA ARIANA	14844
156.	GARY D. NELSON ASSOCIATES, INC.	1096
157.	GATHER NO MOSS LTD	19820
158.	GAZDA, CAROL	16764
159.	GEORGE ELDERKIN	17048
160.	GEORGE, DEBRA KAY	5551
161.	GIDEON'S SOURCE OF KANSAS INC	9861
162.	GILL, MARTHA	19218
163.	GOVEA, FELIPE	8037
164.	GRAPHIC TEAM INC.	8913
165.	GRAVES, PAMELA	14124
166.	GRAY, CHRISTINE	15301
167.	GRIFFIN, WILLIE	12798
168.	GUERRERO, JAVIER	12427
169.	GUO, ANDREW	11161
170.	GUSTAVE-WILBORN, GHYSLAINE	17635
171.	GUTRICK, BARBARA	15523
172.	H. DENNIS LEWTON, O.D.	5829
173.	HADEN, AARON	8
174.	HADEN, AARON	10
175.	HADEN, AARON	11
176.	HADEN, AARON	14
177.	HADEN, AARON	16
178.	HADEN, AARON	17
179.	HALE, MICHAEL	12404
180.	HALIMA, RUBEN	7872
181.	HALL, JANICE	19658
182.	HAMILTON, LATONYA	26466
183.	HAMMER, SAM & DEBBIE	19383
184.	HANNA, CHRISTOPHER DORIAN	8635
185.	HARRIS, BETTY J	17415
186.	HEATH OFSTEAD	9677
187.	HEINEMANN, ROBERT C	9625
188.	HERNANDEZ ALBELO, JOEL E	9158

**Debtors' Thirty-Sixth Omnibus Objection to Claims**  
**Exhibit 1 - Disputed Claims**

Schedule of Disputed Claims to be Reclassified		
Ref #	Disputed Claims	Affected Proof of Claim No.
189.	HERNANDEZ, CATHERINE	4966
190.	HERNANDEZ, CATHERINE CANNON	2979
191.	HERRERA, ELSA	19065
192.	HERRON, FRANK E	9700
193.	HERRON, HENRIETTA	11958
194.	HG TRADING INC	3556
195.	HILL, DEBORAH	19004
196.	HILL, DEBORAH	19011
197.	HILL, JOHN M.	8122
198.	HILL, MARGARET	13651
199.	HILL, ROSA L.	15949
200.	HOBSON-WILLIAMS, TANYA	10883
201.	HOLMES, CAROL	20071
202.	HOMER, ISLE	19497
203.	HOOKS, LAPRICIA	11505
204.	HOUSTON, FRAZIER	15931
205.	HOUSTON, MARTAVIA SHAREE	4223
206.	HULSEY, MARTHA DIANN	5824
207.	HUTCHINGS, MICHAEL	12304
208.	HUTCHINS, TRUESELLA	11349
209.	HUZALA INC	1590
210.	INDUSTRIAL REFRIGERATION SERVICES/GREGORY STEEN	13994
211.	INDUSTRIAS DE MOVEIS ROTTA LTDA	2686
212.	INGRAM ELECTRO-MEK, INC.	3590
213.	INNA MAZE	15903
214.	INSTALLATIONS AP LLC	1044
215.	INTEGRATED SERVICE MGT LLC	10449
216.	IRVIN PUBLIC RELATIONS	4858
217.	J&L INSTALLS, LLC	4410
218.	JACKSON CLEANING SERVICES, LLC	14140
219.	JACKSON, BRITTANY BRIA	9440
220.	JACKSON, CASSANDRA	16249
221.	JACKSON, WILLIAM	10837
222.	JANDI SERVICES	20601
223.	JANSEN, JASON	17741
224.	JAP & SONS SOLUTIONS ONLINE	3994
225.	JASSO, DEBRA	13144
226.	JENKINS, TIARA	15875
227.	JEROME-BERRY, SHERRY	18647
228.	JOHNSON, GERALDINE	10190
229.	JOHNSON, LYNDIA	15897
230.	JOINER, CANDIS	6984
231.	JONES, HILDA	19027
232.	JOSIAH, COOKIE K.	11152
233.	JOYNES, GEORGE (MRS) C	14346
234.	KAN, WENKANG	6010
235.	KELLER, ARNOLD	18964
236.	KELLER, KRISTIE	8960
237.	KELLY, GLORIA	10608
238.	KEMP, BRANDON	8996
239.	KEYLESS SHOP INC	12007
240.	KHAN, SHAHARYAR	12860
241.	KING, WANDA MARCELLA	6071
246.	KITAGAWA, MARTIN A	6909
247.	KONOPKA, KERRY	12915
248.	KRAUSE WATCH CO.	1477
249.	KUBWIMANA, SERGE	16278
250.	KUNZ, EDNA PATRICIA	5486
251.	KUPPINGER, JOHN	5339
252.	KURYLOWICZ, ROBERT	4493
253.	KURZER, ANN	5863
254.	LABISSIERE, MARIE	14944

**Debtors' Thirty-Sixth Omnibus Objection to Claims**  
**Exhibit 1 - Disputed Claims**

Schedule of Disputed Claims to be Reclassified		
Ref #	Disputed Claims	Affected Proof of Claim No.
255.	LACY, KATHY J.	11794
256.	LANGE, HELEN K	19634
257.	LANGE, MARK	19424
258.	LANZAFAME, IGNAZIO	5658
259.	LAROCQUE, MICHAEL	19466
260.	LAU, COOBE	12448
261.	LEAKS, JOHNNY AND SARA	15014
262.	LEE W. FLANAGAN LANDSCAPING	4885
263.	LEE, WILLA	17912
264.	LEE'S LAWN SERVICE	5337
265.	LEE'S MAINTENANCE SERVICE INC.	5357
266.	LI, JANE	5513
267.	LIDWINE, JEAN BAPTISTE	14510
268.	LIGGINS EYE CONSULTANTS, INC.	8132
269.	LIGGINS, PHILLIP M.	8134
270.	LILY'S TALENT AGENCY	4831
271.	LINK, TERRENCE	14351
272.	LIPPS LLC	5421
273.	LISSE, ALEKSANDR	15409
274.	LK OK CARPET INSTALLATIONS, LLC	2449
275.	LL&D INC.	1589
276.	LOCH, LYNDIA S	14507
277.	LOVE, THOMAS	11412
278.	LOVELL, ERNESTINE W	17052
279.	LUCINBILL, INC.	2127
280.	LUX LOGS LTD	5142
281.	MACFARLANE, ROBERT	17844
282.	MACHUGA CONTRACTORS, INC.	4520
283.	MAGGARDS TIME SERVICE INC	10867
284.	MAGGARD'S TIME SERVICE, INC STORE# 1465	3029
285.	MARILYN OWNS MEDICINE	6947
286.	MARK GILES LANDSCAPE COMPANY	1491
287.	MARLOW, MINDI	5176
288.	MARONA, SCOTT	15776
289.	MARTIN, MARY	19889
290.	MASON, EDWARD	10924
291.	MATHEWS, PATRICIA	19472
292.	MAXWELL, SCOTT LEE	6191
293.	MAYO, LOUISE H.	18293
294.	MAYS, CORNELIUS	15251
295.	MCCOWAN, BETTY	14933
296.	MCILWAIN, RALPH	1031
297.	MEADOWBROOK HARDWARE	8147
298.	MEMBRILA, TOMAS	1460
299.	MENDOLERA, CHRISTINA	4628
300.	MENJIVAR, DORIBEL E.	6707
301.	MESEWICZ, DAVID P	2942
302.	MILLER, JILL PAXTON	3996
303.	MILLER, MELISSA	12472
304.	MINNESOTA STAFFING LLC DBA AAA LABOR	4815
305.	MITCHELL, TINA	11997
306.	MOORE, JAN	6783
307.	MOORE, JOHN AND DONNA	9044
308.	MORALES, CORINA	19387
309.	MOROSSETTI, ALVIN	19933
310.	MORRIS, SUSAN K	1800
311.	MORTON, JOANN	13550
312.	MOUSER, JULIA L.	16158
313.	MOYE, OPHELIA	2209
314.	MP HOLDING N AMER, INC.	13015
315.	MP HOLDINGS, LLC	18048
316.	MUSTAPHA, PRINCESS J.	5760

**Debtors' Thirty-Sixth Omnibus Objection to Claims**  
**Exhibit 1 - Disputed Claims**

Schedule of Disputed Claims to be Reclassified		
Ref #	Disputed Claims	Affected Proof of Claim No.
317.	MUTTALIB, FAAROUQ	13883
318.	MYOPTICS, LLC/ ALICE P. NGUYEN, OD	6036
319.	NAIK, VINAYAK	10807
320.	NASHUA WASTEWATER SYSTEMS	6682
321.	NAVA, JUANITA	11628
322.	NELSON, DAYNA DIANE	11373
323.	NENABER, PHILLIP	4789
324.	NEUBAUER, FRANK	15891
325.	NEVERSON, CHERYL	13324
326.	NEW DIMENSIONS	3923
327.	NEWTON, TIFFANY	14798
330.	NGUYEN, TRAM (LORI) OD	15976
331.	NICKS, GARY	3359
332.	NICKS, GWENDOLYN D.	13254
333.	NIN GROUP INC	12932
334.	NIN GROUP INC.	12934
335.	NORTHERNMARINEELECTRONICS.COM	4358
336.	NORTHGATE GARAGE DOOR CO., LLC	5477
337.	NORTHGATE GARAGE DOOR CO., LLC	5481
338.	NORTHWEST REMODEL GUYS LLC	84
339.	NW SALES CONNECTION, INC	1779
340.	OAK BROOK MECHANICAL SERVICES, INC.	6136
341.	OAK BROOK MECHANICAL SERVICES, INC.	6139
342.	ODONNELL, KRISTEN	9532
343.	OJO CREATIVE	6868
344.	OLIVAS, JUAN	4489
345.	OLIVER, VIRGINIA	14162
346.	ONEAL, DARLENE	9320
347.	OTAGURO, KELVIN	11582
348.	OWENS III, JOHN WILLIAM	7100
349.	PADEN, ED	10995
350.	PALKON, REGINA	19056
351.	PARAS, ROBERTO P.	18832
352.	PASS IT ON INC.	2643
353.	PAUL, CURTES	11618
354.	PAYNE, SAM	7008
355.	PEARSON, ANTHONY	18321
356.	PERKINS, KEISHA	8029
357.	PHAM, YEN	9463
358.	PHIPPEN, HEIDI	8506
359.	PIERRE, BOUTROS	8965
360.	POLISE, CONCETTA	11513
361.	POWELL, ROBERT D.	15041
362.	PRECISION AIR COMFORT LLC	14591
363.	PREMIER PRODUCTS LLC	6962
364.	PRIOR, JOSEPHINE	4997
365.	PSS PATHFINDER, INC.	8662
366.	PUCELY, JOEL	20311
367.	PUCELY, JOEL	7102
368.	QUALIMAX MARKETING INC	2321
369.	QUINN, DORETHA	18235
370.	R & S APPLIANCE INSTALLATIONS, INC.	2422
371.	RAMASAR, NAVITA	6876
372.	RAMIRO, JUDITH	12733
373.	RANSCAPES, INC.	7732
374.	REGIS ELECTRIC LLC	16323
375.	RESIDENTIAL BUILDERS ASSOCIATION (RBA)	7564
376.	RICHARDSON, TANAKA	18403
377.	RING, JEFF	5378
378.	ROBERT OR SARA BROWN 33845	1221
379.	ROBINSON, SHUNTAI	19069
380.	ROGERS, ETHELEEN	10584

**Debtors' Thirty-Sixth Omnibus Objection to Claims**  
**Exhibit 1 - Disputed Claims**

Schedule of Disputed Claims to be Reclassified		
Ref #	Disputed Claims	Affected Proof of Claim No.
381.	ROGERS, VIOLA Y	16907
382.	ROI ENERGY INVESTMENTS, LLC	5592
383.	ROKANAS, NICHOLAOS	10532
384.	ROSALES, FREDDY MEZA	4278
385.	ROSS, ELIJAH	19103
386.	ROWAN, ESTHER M	12985
387.	RUSH, ADRIENNE	12618
388.	SAENZ, NICEFORO	12067
389.	SALEEM, UMMAD	1638
390.	SANDERS, BARBARA	11127
391.	SANDERS, JOHN	11832
392.	SANFELIZ, MARIA D	5897
393.	SAPP, RANDALL	4999
394.	SAUNDERS, GEORGE	19923
395.	SAWIN, CAROLYN R	12293
396.	SAX O.D., DREW A.	6548
397.	SCOTT, LAKISHA	12630
398.	SEGERS, REVOIR	13354
399.	SERVICE FINANCE	9780
400.	SILVER CITY JEWELRY INC.	12728
401.	SISTER MOON BOUTIQUE	5236
402.	SMITH, CARRIE	12754
403.	SMITH, MAMIE	19879
404.	SMITH, SHIRLEY	10799
405.	SMITH, VIVIAN	15827
406.	SNELLING	5589
407.	SS GROUP INC	8495
408.	STAGLIANO, SAMUEL	19251
409.	STALBAUM, CINDY	10486
410.	STANIOS INDUSTRIAL SUPPLY CO	2346
411.	STEIN, SCOTT	18498
412.	STEPHENSON, JARMILIA	17790
413.	STONE SOUP 3, INC	13100
414.	STOTT RYAN, SUE	7851
415.	STUCK'S HEATING AND COOLING	778
416.	STUDIO HIROSHI LLC	931
417.	STUTZ, RICHARD	3553
418.	SUNCOAST RENOVATIONS AND REMODELING LLC	987
419.	SUNNY FASHION INC.	1599
420.	SUPPLE, LISA	18754
421.	SWEPT AWAY LLC	9323
422.	TASIE, CHUKWUEMEKA R.	9028
423.	TAYLOR'S SMALL ENGINE REPAIR	3037
424.	TCA HOLDINGS PROPARTNERS LLC	7151
425.	TEAL CONSULTING GROUP	14411
426.	TEXAS PLUMBING DIAGNOSTICS	10630
427.	TEXAS PLUMBING DIAGNOSTICS	11103
428.	TEXAS PLUMBING DIAGNOSTICS	14970
429.	TEXAS PLUMBING DIAGNOSTICS	15254
430.	TEXAS PLUMBING DIAGNOSTICS	18243
431.	THE BICYCLE DOCTOR OF BROWARD, INC.	6498
432.	THE CORE ORGANIZATION	17323
433.	THE LAWN PROZ OF FLORIDA INC	7870
434.	THE ROCKIES LLC	2
435.	THOMAS, DELSIA	19943
436.	THOMAS, KANIKI	1911
437.	TIGER MEDIA INC.	4725
438.	TILLER, TINA	13731
439.	TOMA, JEAN	8523
440.	TOP STEP MANUFACTURING, LLC	4
441.	TORRES, ANGELICA	6147
442.	TREASURE EXCHANGE	3872

**Debtors' Thirty-Sixth Omnibus Objection to Claims**  
**Exhibit 1 - Disputed Claims**

Schedule of Disputed Claims to be Reclassified		
Ref #	Disputed Claims	Affected Proof of Claim No.
443.	TRITTSCHUH, DIANE	17727
444.	TYLER, EARL	12243
445.	USA MAINTENANCE OF FLORIDA LLC	5544
446.	VALENCIA, AURELIO	10511
447.	VANDERPOOL, MICHELLE	18421
448.	VANWINKLE, EDDIE	12392
449.	VASANT S. JADIA, TIME JEWELS, VENDOR # DUN 1000338024	3834
450.	VENCO WESTERN, INC.	8268
451.	VICTORY MARKETING AGENCY LLC	16129
452.	VINYERD, DARLENE	13282
453.	VUE, PAHOUA	5223
454.	W S C	15040
455.	WAHAB, OLAYINKA	3625
456.	WARNER, PHILIP	15616
457.	WARREN, ANGELIQUE	11108
458.	WASHINGTON, GLORIA	19970
459.	WATKINS, JAMES	10008
460.	WAZEED, WAKEEDA	12381
461.	WEDLOWE, EDDIE	11899
462.	WELLS SWEEPING	13394
463.	WESTERN NEON INC	12913
464.	WEYNI, NJEMILE	10483
465.	WHEELDON'S ALTERNATIVE ENERGY	835
466.	WHITAKER, SHARON	10933
467.	WHITTLE, WILLIAM	15838
468.	WIEBE, BRIAN	5663
469.	WILLIAMS, RUFUS	14330
470.	WILLIAMS, TANGANICA	9321
471.	WILLOUGHBY, JANICE	16657
472.	WOLFORD, ARTHUR	94
473.	WOODARD, CHERYL JEAN	19585
474.	WOOLBRIGHT, CHERYL V	19710
475.	WORLD TIME WATCH & JEWELRY REPAIR	12188
476.	XU, ALICE	7002
477.	YELLOWDEVIL LLC	4830
478.	YETI CONSTRUCTION AND REMODELING LLC	58
479.	YOSHIMITSU, DEBRA	11962
480.	YOUMANS, DENNIS	2020
481.	YOUMANS, DENNIS	2287
482.	YOUNG, JAMES M	6113
483.	ZABILKA, MELISSA	12116
484.	ZAVALA, PATRICIA	17868
485.	ZAZADO, MARYANN K	10950
486.	ZAZZLE, INC	1645
487.	ZHENG, MICHAEL LI & MEI	11665



**Exhibit B**

**Redline**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11**  
:   
**SEARS HOLDINGS CORPORATION, et al.,** : **Case No. 18-23538 (RDD)**  
:   
**Debtors.**<sup>1</sup> : **(Jointly Administered)**  
-----X

**ORDER GRANTING DEBTORS' THIRTY-SIXTH  
OMNIBUS OBJECTION TO PROOFS OF CLAIM  
(RECLASSIFICATION)**

Upon the *Debtors' Thirty-Sixth Omnibus Objection to Proofs of Claim (Reclassifying Claims)*, filed on October 19, 2021 (the "**Objection**"),<sup>2</sup> of Sears Holdings Corporation and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "**Debtors**"), pursuant to section 502 under title 11 of the United States Code (the "**Bankruptcy Code**"), and Rule 3007 of the Federal Rules of Bankruptcy Procedures (the "**Bankruptcy Rules**"), all as more fully set forth in the Objection; and the Bankruptcy Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. §§ 157(a)-(b) and 1334 and the *Amended Standing Order of Reference M-431*, dated January 31, 2012 (Preska, C.J.); and consideration

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brands Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRE Holding Corporation (4816). The location of the Debtors' corporate headquarters is c/o M-III Partners, LP, 1700 Broadway, 19th Floor, New York, NY 10019.

<sup>2</sup> Capitalized terms not otherwise herein defined shall have the meanings ascribed to such terms in the Objection.

of the Objection and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Bankruptcy Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the relief requested in the Objection having been provided, and it appearing that no other or further notice need be provided in accordance with the Amended Case Management Order; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; ~~and the Bankruptcy Court having held a hearing to consider the relief requested in the Objection on \_\_\_\_\_ (the “Hearing”); and upon the record of the Hearing, and upon all of the proceedings had before the Bankruptcy Court;~~ and the Bankruptcy Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and that the relief sought in the Objection is in the best interests of the Debtors, their estates, their creditors, and all parties in interest; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT**

1. The Objection is granted.
2. Pursuant to section 502 of the Bankruptcy Code and Bankruptcy Rule 3007, each Proof of Claim listed on **Exhibit 1** annexed hereto and each asserted claim associated therewith (collectively, the “**Disputed Claims**”) is reclassified in its entirety to a general unsecured claim.
3. This Order shall not be deemed to waive, impair, release, or effect on any claims, causes of action the Debtors may hold against the Claimants, including but not limited to, claims under chapter 5 of the Bankruptcy Code, and all claims and causes of action against such Claimants shall be expressly preserved.
4. The rights of the Debtors to assert further objections to the Disputed Claims, in whole or in part, and on any basis, are fully preserved.

5. The Debtors, the Debtors' claims and noticing agent, Prime Clerk, and the Clerk of this Bankruptcy Court are authorized to take all actions necessary or appropriate to give effect to this Order.

6. The terms and conditions of this Order are effective immediately upon entry.

Dated: \_\_\_\_\_, 2021  
White Plains, New York

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HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE